

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America,

Plaintiff,

v.

Kartale Richardson

Case: 4:25-mj-30422

Judge: Ivy, Curtis

Filed: 06-30-2025

Defendant(s).

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief:

On or about the date(s) of March 17, 2025, in the county of Genesee
in the Eastern District of Michigan, the defendant(s) violated:

Code Section

18 U.S.C. § 922(g)(1)

Offense Description

Felon in possession of a firearm

This criminal complaint is based on these facts:

Please see the attached affidavit.



Continued on the attached sheet.



Complainant's signature

Todd Monfette, Special Agent - ATF&E

Printed name and title

Sworn to before me and signed in my presence.

Date: June 30, 2025

City and state: Flint, Michigan



Judge's signature

Curtis Ivy, Jr., United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Special Agent Todd Monfette, being first duly sworn, hereby depose and state as follows:

INTRODUCTION & AGENT BACKGROUND

1. The purpose of this affidavit is to establish probable cause that on or about March 17, 2025, in the Eastern District of Michigan, Kartale Richardson (DOB: XX/XX/1992), knowing he had a previous conviction for a crime punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, in violation of 18 U.S.C. § 922(g)(1).

2. I have been a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), United States Department of Justice, assigned to the Detroit Field Division since July 2017. I graduated from the Criminal Investigator Training Program and the ATF Special Agent Basic Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia. During my employment with ATF, I have conducted and/or participated in numerous criminal investigations involving the possession and use of firearms, drug trafficking violations, criminal street gangs and other violations of federal law.

3. I make this affidavit from personal knowledge based on the following: my participation in this investigation, including witnessing interviews by myself and/or other law enforcement officers, communications with others who have

personal knowledge of the events and circumstances described herein, and information gathered through my training and experience. Because this affidavit is being submitted for the limited purpose of establishing probable cause for a criminal complaint, I have not included every fact known to me concerning this investigation.

PROBABLE CAUSE

4. Since February of 2025, ATF has been investigating the illegal possession and sale of firearms by convicted felon Kartale Richardson.

5. I reviewed Richardson's criminal history records, which show that he has the following felony convictions:

- 2016 – Felon in Possession of a Firearm – Eastern District of Michigan (case number 16-cr-20286);
- 2018 – Controlled Substance – delivery of manufacture of cocaine, heroin or another narcotic, less than 50 grams – 7th Circuit Court, Genesee County, Michigan;
- 2019 – Felon in Possession of a firearm – Eastern District of Michigan.

6. I reviewed a court document in Richardson's 2016 conviction for felon in possession of a firearm. On June 2, 2016, in case number 16-cr-20286-1, Kartale Richardson signed an acknowledgment of indictment (ECF No. 13) in which he acknowledged that he understood he could be sentenced up to ten years' imprisonment for the offense of felon in possession of a firearm.

7. On March 17, 2025, an ATF special agent acting in an undercover capacity (UCA) made a controlled purchase of a firearm from Richardson at a residence in Flint, within the Eastern District of Michigan. During the controlled purchase, the UCA was equipped with audio and video recording devices and activated them before arriving at this residence.

8. Before the controlled purchase, the UCA communicated by phone with Richardson to arrange the deal. In one communication, Richardson sent the UCA a photograph depicting a 1911 style pistol with an attached light/laser for sale.

9. Upon arrival at the residence, the UCA saw Richardson approach the undercover vehicle and sit in the front passenger seat. Richardson then removed a pistol from his waist band area and manipulated the pistol's slide to show that it was not loaded.

10. The UCA asked Richardson if he had any ammunition for the firearm, and Richardson indicated that he did. Richardson then removed a small plastic bag from his pocket that contained five rounds of live .45 caliber ammunition. Richardson also informed the UCA that he had an extra magazine available for purchase.

11. Richardson and the UCA agreed upon a price for the above-described items. The UCA provided Richardson with an amount of prerecorded government funds in exchange for one Shooters Manufacturing, model 1911G1, .45 caliber pistol, S/N: G1125494 with magazine, five live rounds of .45 caliber ammunition, and an extra magazine. This concluded the controlled purchase.

12. Afterward, an agent compared the purchased pistol to the photograph that Richardson sent to the UCA before their meeting. The purchased pistol appears to be the same gun depicted in the photograph.

13. I have spoken with ATF Special Agent Dustin Hurt, who has received specialized training regarding the manufacture and shipping of firearms. Special Agent Hurt stated that the Shooters Manufacturing, model 1911G1, .45 caliber pistol, bearing S/N: G1125494, was manufactured outside the state of Michigan.

CONCLUSION

14. Based upon the above information, probable cause exists to believe that on March 17, 2025, in the Eastern District of Michigan, Kartale Richardson,

knowing he had a previous conviction for a crime punishable by a term of imprisonment exceeding one year, knowingly possessed, in and affecting commerce, a firearm, in violation of 18 U.S.C. § 922(g)(1).



Special Agent Todd Monfette
Bureau of Alcohol, Tobacco, Firearms and Explosives

Subscribed and sworn before me or
by reliable electronic means.



Honorable Curtis Ivy, Jr.
United States Magistrate Judge

Dated: June 30, 2025